

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DIMITRI CHARALAMBOPOULOS,

Plaintiff/Counter-Defendant,

v.

CAMILLE GRAMMER,

Defendant/Counter-Plaintiff.

§
§
§
§
§
§
§
§
§

CASE NUMBER 3:14-cv-02424-D

**DEFENDANT/COUNTER-PLAINTIFF CAMILLE GRAMMER'S APPENDIX TO
MOTION FOR ATTORNEYS' FEES AND OTHER EXPENSES PURSUANT TO
THE TEXAS CITIZENS PARTICIPATION ACT AND BRIEF IN SUPPORT**

RICHARD A. ROHAN

Texas State Bar No. 17203800

THOMAS S. CONNER

Texas State Bar No. 24082850

**CARRINGTON, COLEMAN, SLOMAN &
BLUMENTHAL, L.L.P.**

901 Main Street, Suite 5500

Dallas, Texas 75202

(214) 855-3000 – Phone

(214) 855-1333 – Facsimile

rrohan@ccsb.com

tconner@ccsb.com

STANTON L. STEIN (*pro hac vice*)

ASHLEY R. YEARGAN (*pro hac vice*)

LINER L.L.P.

1100 Glendon Avenue, 14th Floor

Los Angeles, California 90024

(310) 500-3500 – Phone

(310) 500-3501 – Facsimile

lstein@linerlaw.com

ayeargan@linerlaw.com

***Attorneys for Defendant/Counter-Plaintiff
Camille Grammer***

INDEX TO APPENDIX

Exhibit 1:	Declaration of Richard A. Rohan	App. 001
Exhibit A:	Online firm biography of Richard A. Rohan	App. 008
Exhibit B:	July 7, 2014 Carrington Coleman Billing Statement	App. 010
Exhibit C:	October 3, 2014 Carrington Coleman Billing Statement	App. 015
Exhibit D:	April 1, 2015 Carrington Coleman Billing Statement	App. 030
Exhibit E:	July 13, 2015 Carrington Coleman Billing Statement	App. 051

Respectfully submitted,

/s/ Richard A. Rohan

RICHARD A. ROHAN

Texas State Bar No. 17203800

THOMAS S. CONNER

Texas State Bar No. 24082850

CARRINGTON, COLEMAN, SLOMAN &
BLUMENTHAL, L.L.P.

901 Main Street, Suite 5500

Dallas, Texas 75202

(214) 855-3000 – Phone

(214) 855-1333 – Facsimile

rrohan@ccsb.com

tconner@ccsb.com

STANTON L. STEIN (*pro hac vice*)

ASHLEY R. YEARGAN (*pro hac vice*)

LINER L.L.P.

1100 Glendon Avenue, 14th Floor

Los Angeles, California 90024

(310) 500-3500 – Phone

(310) 500-3501 – Facsimile

lstein@linerlaw.com

ayeargan@linerlaw.com

Attorneys for Defendant/Counter-Plaintiff

Camille Grammer

CERTIFICATE OF SERVICE

The undersigned certifies a copy of the foregoing instrument was served upon the attorneys of record for the Plaintiff/Counter-Defendant in the above cause in accordance with Rule 5 of the Federal Rules of Civil Procedure, on this 1st day of September, 2015.

/s/ Richard A. Rohan

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DIMITRI CHARALAMBOPOULOS,

Plaintiff/Counter-Defendant,

v.

CAMILLE GRAMMER,

Defendant/Counter-Plaintiff.

§
§
§
§
§
§
§
§
§

CASE NUMBER 3:14-cv-02424-D

DECLARATION OF RICHARD A. ROHAN

I, Richard A. Rohan, make the following declaration pursuant to 28 U.S.C. § 1746 and hereby declare under penalty of perjury that the following is true and correct:

1. My name is Richard A. Rohan. I am over the age of 21 and am otherwise competent to make this declaration. The statements in this Declaration are based on my personal knowledge and are true and correct.

2. I am a partner in the law firm of Carrington, Coleman, Sloman & Blumenthal, L.L.P. ("Carrington Coleman"). I have been licensed to practice law in the State of Texas since 1984. Attached as Exhibit A is a printout of my online firm biography, which describes some of my qualifications and experience as an attorney. I have more than thirty years of experience handling complex commercial and civil litigation matters.

3. I am an attorney of record for Defendant/Counter-Plaintiff Camille Grammer ("Grammer") in the above-entitled and numbered cause (the "Litigation"). Thomas Conner, who is also counsel of record for Ms. Grammer in this matter, is an associate at Carrington Coleman and has been licensed to practice law in the State of Texas since 2012. Mr. Conner also has

experience in representing clients in complex commercial litigation matters for Carrington Coleman.

Reasonable Hours Spent

4. Pursuant to Section 27.009 of the Texas Civil Practice and Remedies Code, Grammer is seeking the recovery of attorneys' fees from Plaintiff/Counter-Defendant Dimitri Charalambopoulos ("Plaintiff") for the hours worked by myself and Thomas Conner in defending against the Litigation and in obtaining dismissal of a number of Plaintiff's causes of action pursuant to the Texas Citizens Participation Act (the "TCPA"). In addition to attorney time, Grammer also seeks recovery from Plaintiff of fees for hours worked by Constance Nims, a Carrington Coleman paralegal, and by Norma Avila, Carrington Coleman litigation support staff. As litigation support staff, Ms. Avila's time was spent on technology-related tasks such as loading documents onto the firm's databases and preparing documents for production.

5. Copies of redacted billing records showing the time entries for which fees are being sought between June 19, 2014 and May 8, 2015 are attached as Exhibits B, C, D, and E. These billing records are from the original billing statements, but have been redacted as described below, and have hours worked broken down for tasks for which fees are being sought in this motion.

6. Removed from these billing records are time entries that were not attributable i) to preparing, researching, and fully briefing one or more of the following services: Grammer's Motion to Dismiss Plaintiff's First Amended Petition Pursuant to the Texas Citizens Participation Act [Doc. No. 13] ("TPCA Motion to Dismiss"), Grammer's Brief in Support of her TCPA Motion to Dismiss [Doc. No. 14], Grammer's Reply Brief in Support of her TCPA Motion to Dismiss [Doc. No. 30], and Grammer's Supplemental Reply Brief in Support of her

TCPA Motion to Dismiss [Doc. No 51], or ii) to participating in the specified and limited discovery conducted pursuant to the Court's January 29, 2015 Memorandum Opinion and Order. Accordingly, Grammer is not seeking recovery of fees for professional services unrelated to her TCPA Motion to Dismiss.

7. For Carrington Coleman's representation of Grammer in 2014, the following hours were spent researching, preparing, and drafting Grammer's TCPA Motion to Dismiss and accompanying briefs and reviewing and analyzing Plaintiff's response:

Name	Role	Hours	Rate	Total	
Richard Rohan	Attorney	42.5	\$520	\$22,100	
Thomas Conner	Attorney	217.1	\$280	\$60,788	
				TOTAL	\$82,888.00

Exhibits B, C / App. 12-26.

8. For Carrington Coleman's representation of Grammer in 2015, the following hours were spent reviewing, organizing, and producing documents; preparing for and defending the depositions of Camille Grammer, Scott MacLean, and Howard Bragman; reviewing Plaintiff's supplemental response; and researching, preparing, and briefing Grammer's supplemental reply brief:

Name	Role	Hours	Rate	Total	
Richard Rohan	Attorney	92.2	\$530	\$48,866	
Thomas Conner	Attorney	148.2	\$295	\$43,719	
Constance Nims	Paralegal	10.4	\$180	\$1,872	
Norma Avila	Litigation Support	8.3	\$195	\$1,618.50	
				TOTAL	\$96,075.50

Exhibits D, E / App. 34-59.

9. As a result of Grammer's TCPA Motion to Dismiss, including the attendant briefing and discovery, four out of the seven legal claims advanced by Plaintiff have been dismissed. (This calculation counts Plaintiff's negligence and gross negligence claims as separate legal claims, and also treats Plaintiff's defamation and defamation per se claims as separate legal claims, both consistent with the manner in which Plaintiff presented them in his complaint in this action.) In addition, of the three claims remaining in the case—malicious prosecution, defamation, and defamation per se—the Motion to Dismiss resulted in a substantial and meaningful reduction of alleged statements that have been found to be actionable under Plaintiff's defamation or defamation per se claims. As a result, in my opinion, it is reasonable and appropriate to discount the overall lodestar fee (the aggregate number of hours times respective hourly rates of the professionals performing those services) by a factor of one-third. By applying this adjustment to the overall lodestar fee, Grammer is thereby seeking 66.67% of the overall lodestar amount. This factor is arrived at by adding the ratio of dismissed legal claims (4/7, or approximately 57%), to a small additional factor due to the fact that many of the

significant statements alleged by Plaintiff to be defamatory, including all of the statements set forth in Grammer's Request for Domestic Violence Restraining Order setting out the details of the events of October 16, 2013, were held by the Court to be privileged and hence not actionable.

10. Applying the 66.67% factor to the aggregate fees of \$178,963.50 incurred in researching and drafting the TCPA Motion to Dismiss and accompanying briefs, responding to discovery requests, and defending depositions related to the TCPA Motion, it is my opinion that a fee of \$119,314.96 represents a reasonable fee for services performed by attorneys, legal assistants, and litigation support personnel from Carrington Coleman in connection with Grammer's TCPA Motion.

11. Based on my extensive involvement in the Litigation, as well as my observation of the work performed by Thomas Conner, Constance Nims, and Norma Avila, it is my opinion that the above hours were reasonable and were reasonably expended in defending against the Litigation and in obtaining partial dismissal of multiple of Plaintiff's causes of action pursuant to the TCPA. Among other things, my opinion is based on the time and labor required to move for dismissal on all of Plaintiff's claims and allegations under the TCPA procedure and standards; that the attorneys were required to spend time researching the TCPA's procedure, standards, and relevant case law, as well as researching and briefing the standards and merits of each of Plaintiff's seven causes of action; that the parties conducted specified and limited discovery, which included Grammer producing documents and defending three depositions; and that Grammer submitted supplemental briefing in her support of her TCPA Motion to Dismiss. This work involved complex legal matters, both procedurally and substantively, required extensive time, and produced practical benefits for the client.

Appropriate Hourly Rate

12. For 2014, my customary billing rate was \$520 per hour, and Thomas Conner's customary billing rate was \$280 per hour. For 2015, my customary billing rate is \$530 per hour, and Thomas Conner's customary billing rate is \$295 per hour. Based on my experience, these billing rates are appropriate and reasonable hourly billing rates in the Northern District of Texas for attorneys with the respective levels of experience working on cases of this nature. I am aware of many commercial litigation attorneys with the same, or even fewer years' experience than I, whose hourly billing rates exceed \$530, often by a substantial amount. The same is true of Mr. Conner's hourly billing rate compared to other associates with similar practices in the Dallas area.

13. For 2015, Constance Nims's customary billing rate is \$180 per hour, and Norma Avila's customary billing rate is \$195 per hour. Based on my experience, it is my opinion that these are reasonable rates for services provided by paralegals and litigation support staff in the Northern District of Texas.

14. Based on my experience practicing law and handling cases of this nature, it is my opinion that \$119,314.96 is a reasonable and appropriate attorneys' fee for the work performed by Carrington Coleman during its representation of Grammer in obtaining dismissal of multiple of Plaintiff's causes of action pursuant to the Texas Citizens Participation Act.

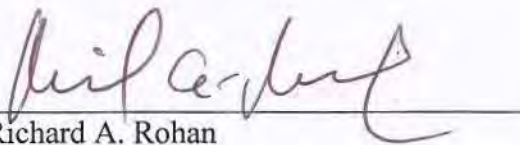
15. For purposes of this Litigation, Carrington Coleman agreed to a special blended rate for the hourly fees charged by the attorneys at Carrington Coleman, but under that blended rate, the aggregate fees described in paragraphs seven and eight total \$178,490.50, and the reduced amount sought under the 66.67% factor would be \$118,999.61.

Other Expenses

16. \$1,709.25 was incurred in travel expenses to prepare for and to defend the depositions of Camille Grammer, Scott MacLean, and Howard Bragman. \$1,752.66 was incurred in expenses to obtain the transcripts and videos of the depositions of Camille Grammer, Scott MacLean, and Howard Bagman. Exhibit D / App. 47, 50. Applying the 66.67% factor determined in paragraph nine to the aggregate expenses of \$3,461.91, Grammer is seeking \$2,308.05 in other expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas, Texas on September 1, 2015.


Richard A. Rohan



RICHARD A. ROHAN

Partner

P: 214-855-3043 F: 214-758-3743 rrohan@ccsb.com

AREAS OF PRACTICE

A Arbitration & Trial, Broker Dealer Disputes, Business Ownership Disputes, D & O Litigation, Derivative & Shareholder Litigation, Environmental & Remediation, Estate / Probate / Guardianship Disputes, Oil & Gas Litigation, Professional Liability, Securities & Directors & Officers, Securities Class Actions

"My ideal client is one who can distinguish a lawyer's bluster from true passion and see the value of honesty and integrity."

At the most basic level, it is fundamentally important for an attorney to understand the client's case. Perhaps equally important, however, is to understand the other side's case.

That's why Richard Rohan gets inside the thought process of the opposing players, from principals to attorneys. This gives him the foresight to anticipate their next move and handle what's likely to happen next.

His clients often find him pushing hard on his own case's weakest spots and finding flaws with what might have seemed an invulnerable position. By preparing for the worst-case scenario, he's ready for the opposition's strongest argument. Given his closeness to the case, he's in the best position to do so and often discovers the other side hasn't discovered many of the issues that he has.

It's this desire to be unflinchingly honest that contributes to his success. Richard fights with integrity, ensuring his clients' business objectives drive his strategy because that's what clients want.

Richard finds satisfaction knowing that his clients can trust his judgment, counsel, and advice in addition to his litigation skills. From entrepreneurial start-ups to large corporations, the value he places on building lasting client relationships fosters a sense of loyalty on both sides.

Experience

Constitutional Law

Succeeded in persuading the Supreme Court of Texas to strike down Tarrant County prison chaplaincy program as violating the First Amendment Establishment Clause.

Oil and Gas

Obtained unanimous jury verdict requiring oil and gas producer to offer \$40 million-interest in producing property to client pursuant to Area of Mutual Interest Clause.

Legal Malpractice

Successfully defended attorney and law firm from malpractice claims arising out of real estate transactions involving Dallas design district.

Successfully defended AmLaw 100 firm against claims of malpractice arising out of pre- and post-petition bankruptcy representation.

Contract/Governmental

Obtained summary judgment in favor of appraisal district against claims of breach of contract, theft of trade secrets, and tortious interference in connection with software development agreement.

Successfully defended corporation in arbitration against claim for earn-out payments following asset sale of telephone directory business.

Education

Harvard Law School
J.D., *cum laude*, 1984

Harvard College
A.B., *cum laude*, 1981

Court Admissions

Texas, 1984
Texas Supreme Court
U.S. District Courts for the Northern, Southern, Eastern and Western Districts of Texas
U.S. Court of Appeals for the Fifth Circuit
U.S. Supreme Court

Speeches/Publications

Brewers Bring Suit Against The TABC For Unconstitutional Taking, Carrington Coleman Capital Newsletter, 2015 Issue Two.

San Antonio Court of Appeals Issues Important Opinion in Chesapeake Royalty Dispute, Carrington Coleman Capital Newsletter, Special Oil and Gas Industry Edition, 2014.



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

July 7, 2014

Bill #: 313856
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 06/30/14:



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/07/14

Bill Number: 313856

Page 2

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com
07/07/14

Bill Number: 313856
Page 3

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

06/19/14	Researched TX Anti-SLAPP Statute (4 . 0)
----------	--

TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com
07/07/14

Bill Number: 313856
Page 4

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
06/20/14	Researched TX Anti-SLAPP Statute (2 . 8)	TSC

06/27/14	Researched TX Anti-SLAPP Statute (2 . 1)	TSC
----------	--	-----



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/07/14

Bill Number: 313856
Page 5

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

October 3, 2014
TO:

Bill #: 315435
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 09/30/14:



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 2

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 3

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

07/18/14	Drafted Brief in Support of Anti-SLAPP Motion to Dismiss (2.7);	TSC
----------	---	-----

07/21/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (4.2);	TSC
----------	--	-----

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 4

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
07/22/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (2.5);	TSC
07/23/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (7.1)	TSC
07/24/14	Confer w/T. Conner re: anti-LAPP motion; strategy; (2.8)	RAR
07/24/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (1.0); Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (5.7);	TSC
07/25/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (7.0);	TSC
07/26/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (2.7)	TSC
07/28/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (6.2);	TSC
07/29/14	, edit brief under anti-SLAPP statute; review literature on anti-SLAPP legislation; (2.0)	RAR

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 5

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
07/29/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (0.6); Reviewed case law in Brief in Support of Anti-SLAPP Motion to Dismiss (2.7); Researched issue and claim preclusion (2.0)	TSC
07/30/14	confer w/T. Conner re: anti-SLAPP motion/brief, 12(b)(6) motion/brief; (0.9)	RAR
07/30/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (0.9); Researched issue and claim preclusion (3.4); Researched and Revised Brief in Support of Motion to Dismiss (6.0)	TSC
07/31/14	analysis and planning re: possible res judicata/collateral estoppel defenses (.3);	RAR
07/31/14	Conferred with R. Rohan about issue and claim preclusion (0.4); Call with R. Rohan, L. Stein, and A. Yeargan re: discovery issues and Anti-SLAPP Motion to Dismiss (0.8); Drafted Declaration of L. Stein (0.5); Research for Anti-SLAPP Motion to Dismiss re: matter of public concern and limited purpose public figure (4.8); Revised Anti-SLAPP Motion to Dismiss (3.9)	TSC
08/01/14	Revised Brief in Support of Anti-SLAPP Motion to Dismiss (3.1); Conferred with R. Rohan about claim preclusion (0.2); Drafted Appendix to Brief in Support of Anti-SLAPP Motion to Dismiss (0.4); Researched claim preclusion (1.4)	TSC
08/02/14	Researched negligence, fraud, and claim preclusion (3.8); Revised Brief in Support of Anti-SLAPP Motion to Dismiss (3.7)	TSC
08/03/14	Revised Brief in Support of Anti-SLAPP Motion to Dismiss (1.3)	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 6

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
08/04/14	Confer w/T. Conner re: revised brief; review, edit anti-SLAPP brief; (3.5)	RAR
08/04/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.1); Drafted Affidavit of Camille Grammer (1.1); Researched TX Anti-SLAPP standards (1.2); Conferred with R. Rohan re: Brief (0.3);	TSC
08/05/14	Confer w/ T. Conner re: brief; (0.3)	RAR
08/05/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.6); with R. Rohan re: Brief (0.3); Affidavit of C. Grammer (0.5); Researched TX Anti-SLAPP standards (0.8) Conferred Revised	TSC
08/06/14	Attention to motion to dismiss and brief; (4.4)	RAR
08/06/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.2); Researched malicious prosecution (2.1); Drafted and revised affidavits of C. Grammer, S. MacLean, and A. Born (3.4); Conferred with R. Rohan re: Brief and Affidavits (0.7)	TSC
08/07/14	Review, revise motions/briefs (to dismiss, (3.0)	RAR
08/07/14	Conferred with R. Rohan re: Brief in Support of Anti-SLAPP Motion to Dismiss (0.4); Reviewed and revised Brief in Support (2.4); Revised Affidavits of C. Grammer, S. MacLean, and A. Born (1.1);	TSC
08/08/14	Conference call re: upcoming filings (0.6)	RAR

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 7

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
08/08/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (4.2); Revised Affidavits of S. MacLean and L. Stein (0.9); Researched Texas Anti-SLAPP case law and CA collateral estoppel (2.1)	TSC
08/09/14	Researched Texas Anti-SLAPP standards (2.0)	TSC
08/10/14	Verified factual and legal citations in Brief in Support of Anti-SLAPP Motion to Dismiss (7.5)	TSC
08/11/14	review, edit brief (1.5)	RAR
08/11/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (2.7); Researched collateral estoppel under CA law (1.3); Compiled Appendix in Support of Brief in Support of Anti-SLAPP Motion to Dismiss and entered citations (2.3); Drafted Proposed Orders (0.9); Revised Declaration of R. Rohan (0.2); Conferred with R. Rohan re: Brief in Support (0.5); Call with A. Yeargan re: Brief in Support (0.2);	TSC
08/12/14	Review papers to be filed to dismiss; supporting briefs); (1.2)	RAR
08/12/14	Reviewed Brief in Support of Anti-SLAPP Motion to Dismiss and other papers to be filed (3.1); Prepared documents for filing (1.3); Conferred with R. Rohan about Anti-SLAPP Motion to Dismiss (0.1)	TSC
08/13/14	Researched TCPA prima facie case and malicious prosecution claim (3.3);	TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 8

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

08/15/14	Researched TCPA prima facie case (2.2);	TSC
----------	---	-----



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 9

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

09/02/14	review opposition to motion to dismiss; (1.0)	RAR
----------	---	-----

09/02/14		TSC
----------	--	-----

Reviewed Plaintiff's Response to Anti-SLAP Motion to Dismiss (2.2); Reviewed cases cited in Plaintiff's Response (1.2)

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 10

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
09/03/14	Review opposition; ; analysis re: responses; (1.7)	RAR
09/03/14	Reviewed cases cited in Plaintiff's Response (2.4); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (2.8);	TSC
09/04/14	review pleadings; Prepare for conference call; conference call with Liner attorneys; analysis and planning re: reply briefing; (3.8)	RAR
09/04/14	Research for Reply Brief to Anti-SLAPP Motion to Dismiss (2.9); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (2.1); Conference Call with R. Rohan, L. Stein, and A. Yeargan re: Reply Brief (1.4);	TSC
09/05/14	Review briefs (2.8); analysis and planning re: content of reply brief (2.4);	RAR
09/05/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (4.8); Call with R. Rohan re: Reply Brief (0.5)	TSC
09/07/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (3.0);	TSC
09/08/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (5.3); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (1.0);	TSC
09/09/14	review, revise reply brief; (3.5)	RAR
09/09/14	Drafted and revised Reply Brief to Anti-SLAPP Motion to Dismiss (5.1); Conferred with R. Rohan re: Reply Brief to Anti-SLAPP Motion to Dismiss (0.5);	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ■ 901 Main Street, Suite 5500 ■ Dallas, Texas 75202 ■ 214.855.3000 ■ fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 11

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
09/10/14	Revise reply brief; (1.8)	RAR
09/10/14	Research for Reply Brief to Anti-SLAPP Motion to Dismiss (2.6); Revised SLAPP Reply Brief (3.5); Conferred with R. Rohan re: SLAPP Reply Brief (0.3); Drafted Appendix in Support of Reply Brief (0.5)	TSC
09/11/14	Review, revise reply brief on motion to dismiss; (2.5)	RAR
09/11/14	Revised Reply Brief to Anti-SLAPP Motion to Dismiss (2.4); Revised Objections to Plaintiff's Appendix in Support of Response Brief (1.0); Research for Objections to Appendix (1.9)	TSC
09/12/14	Review, revise ; reply brief; (1.5)	RAR
09/12/14	Research for Objections to Appendix (0.7); Call with A. Yeargan re: reply briefing (0.3); Reviewed and revised Reply Brief to Anti- SLAPP Motion to Dismiss (2.8); Reviewed and revised Objections to Plaintiff's Appendix in Support of Response Brief (3.7);	TSC
09/13/14	Review proposed edits to reply; (0.5) ;	RAR
09/15/14	Review, revise reply brief; (0.5)	RAR
09/15/14	Cite and fact check of Reply Brief to Anti-SLAPP Motion to Dismiss, (1.6)	TSC

Conferred with R. Rohan re: Reply
 Briefs (0.2); Revised Reply Brief to Anti-SLAPP Motion to



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 12

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
	Dismiss (0.6);	
09/16/14	Revised Objections to Plaintiff's Appendix in Support of Response Brief (0.8); Reviewed and prepared pleadings in anticipation of filing (3.1);	TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 13

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 14

DETAIL OF PROFESSIONAL SERVICES RENDERED



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. ▪ 901 Main Street, Suite 5500 ▪ Dallas, Texas 75202 ▪ 214.855.3000 ▪ fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

10/03/14

Bill Number: 315435

Page 15

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

April 1, 2015
TO:

Bill #: 318610
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 03/31/15:



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 2

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 3

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 4

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 5

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

01/29/15	review order; phone w/client; (3.0)	RAR
----------	-------------------------------------	-----

01/29/15		TSC
----------	--	-----

Reviewed and analyzed order on
TCPA Motion to Dismiss (2.4); Conference call with C. Grammer,
L. Stein, A. Yeargan, and R. Rohan re: order (0.7)

01/30/15	Review order; (1.5)	RAR
----------	---------------------	-----

01/30/15	Reviewed and analyzed order on TCPA Motion to Dismiss (1.2);	TSC
----------	--	-----

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 6

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/01/15	Review order; analysis and planning re: discovery; (1.5)	RAR
02/02/15	analysis and planning; telephone calls w/G. Fisher re: limited discovery; (3.9)	RAR
02/02/15	Researched absolute privilege and republication under TX law (4.9); Call with L. Stein, A. Yeargan, and R. Rohan re: expedited SLAPP discovery (0.6); Document review of client documents for SLAPP discovery (0.8); Correspondence with document review vendor (0.3)	TSC
02/03/15	Researched absolute privilege and republication under TX law (2.0); Call with A. Yeargan re: SLAPP discovery (0.1); Document review of client documents for SLAPP discovery (0.3);	TSC
02/04/15	Document review of client documents for SLAPP discovery (5.5)	TSC
02/05/15	Conference with attorney regarding witness files. (0.1)	CN
02/05/15	telephone calls w/G. Fisher re: discovery; (0.2)	RAR
02/05/15	Document review of client documents for SLAPP discovery (7.1); Reviewed Plaintiff's Requests for Production (0.6); Call with S. MacLean re: document requests (0.4); Correspondence with R. Rohan and L. Stein re: RFP (0.1)	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 7

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/06/15	Inter-office communications with Thomas Conner re: Relativity native export (.10); Download documents from (.10); Analysis, review, organization of downloaded data and prepare copy set for Thomas Conner's analysis and review (1.2)	NA
02/06/15	review discovery requests; (0.3)	RAR
02/06/15	Document review of client documents for SLAPP discovery (4.4); Drafted Objections and Responses to Plaintiff's Requests for Production (2.5)	TSC
02/07/15	Document review of client documents for SLAPP discovery (2.4)	TSC
02/09/15	review document requests; (0.2)	RAR
02/09/15	Document review of client documents for SLAPP discovery (1.8); Drafted Objections and Responses to Plaintiff's Requests for Production (0.5); Drafted memorandum re: absolute privilege and republication under TX law (2.6)	TSC
02/10/15	Conference with attorney regarding upcoming deposition of Camille Grammer. (0.1)	CN
02/10/15	Review documents for production; (1.0)	RAR
02/10/15	Document review of client documents for SLAPP discovery (2.3); Meeting with R. Rohan re: documents for SLAPP discovery (0.7); Drafted memorandum re: absolute privilege and republication under TX law (2.0); Researched qualified privilege and drafted memorandum (2.9); Compiled documents in preparation for depositions of C. Grammer, S. MacLean, and H. Bragman (0.5)	TSC
02/11/15	Conference with attorney regarding witness binders in preparation for upcoming depositions. (0.1)	CN

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 8

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/11/15	review documents for possible production; (2.5)	RAR
02/11/15	Document review of client documents for SLAPP discovery (1.2); Revised memorandums re: absolute privilege / republication and qualified privilege (1.3); Call with A. Yeargan re: SLAPP discovery (0.2);	TSC
02/12/15	Conference with attorney regarding upcoming depositions, and document production; Review client documents and forward to the copy center with instructions for copying (0.6)	CN
02/12/15	Review documents for production; (1.7)	RAR
02/12/15	Collected and reviewed client documents for SLAPP discovery production (4.2); Conferred with R. Rohan re: SLAPP discovery production (0.2); Conferred with C. Nims re: document production and witness files (0.1); Revised Objections and Responses to Plaintiff's Requests for Production (1.2); Researched absolute privilege and republication under TX law (1.9)	TSC
02/13/15	Begin making copies and organizing documents to be used during the witness interviews of Scott McLean, Howard Bragman, and Camille Grammer. (2.2)	CN
02/13/15	Review documents for production; (1.0) analysis and planning re: deposition timing and preparation; (1.0)	RAR
02/13/15	Collected and reviewed client documents for SLAPP discovery production (2.0); Compiled documents for witness files (2.7);	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 9

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/17/15	Finish making copies and organizing documents to be used during the witness interviews of Scott McLean, Howard Ragman, and Camille grammar. (2.3)	CN
02/17/15	review documents for (1.5) production; telephone calls w/Guy Fisher re: scheduling; (0.2)	RAR
02/17/15	Collected and reviewed client documents for SLAPP discovery production (3.1); Call with C. Grammer re: client documents (0.4); Call with A. Yeargan re: discovery production (0.2); Prepared witness prep files (2.6);	TSC
02/18/15	Complete the review, and organization, of documents to be used during the witness preparation of Camille Grammer, Scott MacLean, and Howard Bragman. (0.8)	CN
02/18/15	attention to discovery; (0.5)	RAR
02/18/15	Compiled and prepared witness prep binders (1.4); Collected and reviewed client documents for SLAPP discovery production (4.2); Revised Objections and Responses to Plaintiff's Requests for Production (0.1); Meetings with C. Nims re: SLAPP discovery production (0.5)	TSC
02/19/15	Review and redact documents in preparation for production, tagging those documents to withhold at this time, and those that are non-responsive. (1.0)	CN

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610
 Page 10

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/19/15	Inter-office communications with Connie Nims and Thomas Conner re: preparation of documents for production (.20); Analysis, review, organization of electronic documents and load in Concordance for review and redaction in anticipation of production (1.10); Review e-mail from Connie Nims re: documents tagged for production (.10); Analysis, review, preparation of documents for production (1.20)	NA
02/19/15	Review documents and objections/responses to document (1.5) request; plan for deposition preparation; (0.5)	RAR
02/19/15	Collected and reviewed client documents for SLAPP discovery production (1.2); Reviewed production documents and witness binders (3.8); Conferred with C. Nims re: document production (0.1); Call with A. Yeargan re: document production and objections to Plaintiff's RFP (0.7); Revised Objections and Responses to Plaintiff's Requests for Production (1.8); Conferred with R. Rohan re: document production (0.3)	TSC
02/20/15	Review the documents received from Liner Law Firm, redact plaintiff's birthdate from all copies of the Restraining Order paperwork, redact Bragman's documents, and tag documents for production; Print documents, organize for attorney in preparation witness interviews. (2.5)	CN
02/20/15	Inter-office communications with Thomas Conner and Connie Nims re: preparation of documents for production (.30); Analysis, review, preparation of documents for production (4.00)	NA
02/20/15	review documents for (1.0) production; deposition preparation; (2.3)	RAR
02/20/15	Revised Objections and Responses to Plaintiff's Requests for Production (0.6); Prepared and served SLAPP discovery production (4.1); Conferred with R. Rohan re: production (0.1); Reviewed witness prep binders (1.5); Revised memorandum re: qualified privilege (1.0);	TSC
02/21/15	Revised memorandums to R. Rohan re: absolute privilege, republication, (1.0)	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloban & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 11

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/22/15	review research; review documents in connection with deposition preparation; (0.8)	RAR
02/23/15	Review documents; prepare for meeting with client and witnesses for deposition preparation; (4.5)	RAR
02/23/15	Drafted legend of relevant phone numbers from text messages (0.7);	TSC
02/24/15	Prepare for meetings with witnesses; witness preparation for depositions; analysis and planning (8.0)	RAR
02/24/15	Conferred with R. Rohan re: document production (0.2);	TSC
02/25/15	Conference with attorney regarding status of production, and location of additional client documents. (0.4)	CN
02/25/15	Prepare for meetings with witness (H. Bragman); witness preparation; study/analysis-correspondence; analysis and planning (8.0)	RAR

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 12

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
03/02/15	Review court opinion in anticipation of upcoming depositions; telephone calls w/Guy Fisher re: discovery; (2.0)	RAR
03/03/15	review deposition notices; review cases on transmission of pleadings and privilege; (0.5)	RAR
03/04/15	Review documents, prepare for video conference with client; deposition preparation; video conference; (6.7)	RAR
03/05/15	analysis and planning re: upcoming depositions; evidence organization; correspondence re: depositions; (1.2)	RAR
03/06/15	Prepare for call with C. Grammer; call w/Grammer to prepare for deposition; (0.8)	RAR
03/08/15	Prepare for meetings, preparation with witnesses; (0.7)	RAR
03/09/15	Prepare witnesses (Grammer, MacLean) for depositions; (8.0)	RAR
03/10/15	Conference with attorney regarding documents needed for witness interviews; Forward client documents to attorney. (0.3)	CN
03/10/15	Prepare, defend depositions of C. Grammer and S. MacLean (9.5)	RAR
03/11/15	Prepare for and defend deposition (H. Bragman); (2.5)	RAR



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 13

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

03/13/15	to R. Rohan re: absolute privilege, (0.5)	Revised memorandums TSC
----------	---	-------------------------



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 14

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

03/19/15

Researched absolute privilege (1.5);

TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 15

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 16

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
03/30/15	Researched absolute/qualified privilege and defamation standards under TX/CA law (3.9); C	TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610
Page 17

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610
Page 18

DESCRIPTION OF EXPENSES

DATE	DESCRIPTION	AMOUNT
03/18/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239386; DATE: 3/18/2015 - Video copies for depositions of Scott MacLean & Camille Grammer	377.74
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239435; DATE: 3/26/2015 Depo transcript of Grammer	668.92
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239436; DATE: 3/26/2015 Depo transcript of MacLean	338.50
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239437; DATE: 3/26/2015 Depo transcript of Bragman.	262.50
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239434; DATE: 3/26/2015 Video of Bragman depo.	105.00



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610
Page 19

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610
Page 20

DESCRIPTION OF EXPENSES

**CARRINGTON COLEMAN**

Carrington, Coleman, Stroman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

03/31/15

Bill Number: 318610

Page 21

DESCRIPTION OF EXPENSES

DATE	DESCRIPTION	AMOUNT
02/19/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: PEQBMI; DATE: 2/19/2015 Expense: Airfare Trip To: Los Angeles Travel Dates: 3/9/15 - 3/11/15 Purpose of Trip: Meet with Client and California Counsel	397.20
02/24/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: 2-24-15; DATE: 2/24/2015 Expense: Hotel, Taxi, Airport Parking Trip to: Los Angeles Travel Date: 2/24/15 -2/25/15 Purpose of Trip: Meeting with client and California counsel.	463.87
03/09/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: 3-9-15; DATE: 3/9/2015 Expense: Hotel, Taxi, Airport Parking Trip To: Los Angeles Travel Dates: 3/9/15 - 3/11/15 Purpose of Trip: Meeting with client and California counsel to prep client for and attend depositions.	848.18



CARRINGTON COLEMAN

Carrington, Coleman, Stoman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

July 13, 2015
TO:

Bill #: 320736
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 06/30/15:



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 2

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Stoman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 3

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
04/06/15	TCPA cases (1.6)	Researched recent TSC



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 4

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 5

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------

04/21/15

TSC

Researched

choice of law for supplemental briefing (1.8);

**CARRINGTON COLEMAN**

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 6

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
04/24/15	review brief; (1.0)	RAR
04/24/15		TSC
	Reviewed Plaintiff's Supplemental Response to TCPA Motion to Dismiss (0.9)	
04/26/15	Review brief; analysis and planning re: response; (1.5)	RAR
04/27/15	Confer w/T. Conner re: reply brief; (0.3)	RAR
04/27/15	Reviewed Plaintiff's Supplemental Response to TCPA Motion to Dismiss and outlined response (1.2); Conferred with R. Rohan re: reply to Plaintiff's Supplemental Response (0.3); Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (5.1); Researched absolute privilege for transmission of pleadings (0.6); Drafted Objections to the Affidavit of Stephen Gonzales (1.4);	TSC



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 7

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
04/28/15		RAR
	strategy re: drafting reply brief on SLAPP motion; (1.0)	
04/28/15		TSC
	Researched hearsay exception for admission against interest (0.7); Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (2.3)	
04/29/15		TSC
	Researched privilege for supplemental briefing (0.7);	
04/30/15	Review draft brief; (0.5)	RAR
04/30/15	Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (3.6);	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 8

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
05/01/15	Researched absolute privilege for transmission of pleadings (1.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (1.0);	TSC
05/03/15	Review draft brief; (1.0)	RAR
05/04/15	Review, edit brief and objections; (1.0)	RAR
05/04/15		TSC
05/05/15	Conferred with R. Rohan re: Supplemental Brief and TCPA research (0.5); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (2.9); Revised Objections to the Affidavit of Stephen Gonzales (0.8)	
05/05/15	review draft reply brief; review proposed affidavit; (3.5)	RAR
05/05/15	Researched hearsay exception for admission against interest (0.8); Conferred with R. Rohan re: Supplemental Brief (0.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (4.3); Reviewed Affidavit of C. Grammer (0.3); Correspondence with L. Stein and A. Yeargan re: TCPA standards, Supplemental Brief, Affidavit of C. Grammer (0.9);	TSC

**CARRINGTON COLEMAN**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
 Tax ID #75-1315313
 Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 9

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
05/06/15	Revise reply brief; call to discuss brief; strategy; (1.5)	RAR
05/06/15	Reviewed Affidavit of C. Grammer (0.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (3.7); Call with L. Stein and A. Yeargan re: comments to Supplemental Brief (0.5); Correspondence with A. Yeargan, L. Stein, and C. Grammer re: Supplemental Brief (0.3)	TSC
05/07/15	review, edit reply brief; (1.0)	RAR
05/07/15	Researched absolute privilege for transmissions of pleadings (1.1); Cite checked Supplemental Brief in Support of TCPA Motion to Dismiss (2.6); Conferred with R. Rohan re: Supplemental Brief (0.2); Revised and reviewed Supplemental Brief (1.9);	TSC
05/08/15	Review, revise brief; (0.9)	RAR
05/08/15	Revised Supplemental Brief in Support of TCPA Motion to Dismiss (1.2); Researched absolute privilege for transmissions of pleadings (0.9) Reviewed Supplemental Brief (0.9); Conferred with R. Rohan re: Supplemental Brief (0.2); Call with A. Yeargan re: Supplemental Brief (0.2); Prepared for and filed Supplemental Brief (0.8);	TSC



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 10

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 11

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 12

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 13

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 14

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 15

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 16

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Stoman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com
07/13/15

Bill Number: 320736
Page 17

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 18

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 19

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 20

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 21

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736

Page 22

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
------	-------------------------	------



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com
07/13/15

Bill Number: 320736
Page 23

DETAIL OF PROFESSIONAL SERVICES RENDERED



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 24

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 25

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sloman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 26

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Soman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 27

DESCRIPTION OF EXPENSES



CARRINGTON COLEMAN

Carrington, Coleman, Sleman & Blumenthal, L.L.P. • 901 Main Street, Suite 5500 • Dallas, Texas 75202 • 214.855.3000 • fax: 214.855.1333

Attorneys at Law
Tax ID #75-1315313
Email: ccsb@ccsb.com

07/13/15

Bill Number: 320736
Page 28

DESCRIPTION OF EXPENSES